

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ALBERTO GARCIA and ARMANDO MORALES  
HERNANDEZ,

Plaintiffs,

- against -

CHIRPING CHICKEN NYC INC. and/or CHIRPING  
CHICKEN U.S.A. INC. d/b/a CHIRPING CHICKEN and  
RAMJI DASS individually,

Defendants.

Docket No.: 15-CV-2335

**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the annexed declaration of Jack L. Newhouse, Esq., dated September 1, 2015, and the exhibits annexed thereto, and upon all pleadings and proceedings heretofore had herein, the undersigned, on behalf of the plaintiffs, will move this Court before the Honorable Cheryl L. Pollak, United States Magistrate Court Judge, at the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, at a date and time to be determined by the Court, for an Order granting Plaintiffs' Motion for a Default Judgment, and for such other and further relief as the Court deems proper and just.

Dated: New York, New York  
September 1, 2015

Respectfully submitted,

VIRGINIA & AMBINDER, LLP

By:                     /s/                      
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